



ARM Group LLC

Engineers and Scientists

November 11, 2020

Ms. Barbara Brown
Project Coordinator
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230

Re: Comment Response Letter:
Excavation Completion Report (Revision 1)
Area B: Parcel B17
Tradepoint Atlantic
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of Tradepoint Atlantic (TPA), ARM Group LLC (ARM) is providing the following responses to a set of comments received from the United States Environmental Protection Agency (USEPA) in an email dated October 22, 2020 regarding the previous submission of the Excavation Completion Report (dated August 13, 2020) for the removal of materials impacted by elevated metals and polynuclear aromatic hydrocarbons (PAHs) on Parcel B17 (the Site) of the TPA property located in Sparrows Point, Maryland. A revised Excavation Completion Report (Revision 1) is provided to the Maryland Department of the Environment (MDE) and USEPA accompanying this letter. Responses to the comments are provided below; the original comments are included in italics with responses following.

1. *Tables 7 - 9 include an incorrect RSL value for dibenz(a,h)anthracene (21 mg/kg). Revise to correct the RSL to 2.1 mg/kg and associated calculations.*

ARM has corrected this error by revising the dibenz[a,h]anthracene Regional Screening Level (RSL) value from 21 mg/kg to 2.1 mg/kg and recomputing the risk ratios on **Table 7** through **Table 9**. The overall risk conclusions remained the same.

2. *The SLRA section of this report states that "This indicates that the surface soils remaining at the Site are suitable to serve as a cap for remaining impacted subsurface materials at the Site." However, most of the surface samples analyzed in the Phase II Investigation Report were collected from the 1 – 1.5 ft bgs interval, and do not satisfy the soil cap requirement of 2 ft. of clean fill underlain by geotextile marker fabric. Thus, the surface soils cannot act as a cap to the*

unacceptable risk posed by the subsurface soils. However, this does not affect the proposed temporary use of the Site for vehicle parking. The cap requirement must be a component of any future RADWP.

The only proposed use of the Site (in the short term) is the proposed vehicle parking as noted in the comment. The identified statement regarding the suitability of the surface soils to act as a cap has been replaced. The capping requirement will be a component of a future Response and Development Work Plan (RADWP) for Parcel B17.

3. *Please revise the Conclusion section to indicate the intended time period of the temporary use for Parcel B17.*

The parking schedule has been added to the Conclusion section. The parking will begin in December 2020, and the tenant agreement provides for a two year tenancy with the ability to renew. TPA has the ability to relocate the tenant at any time, even during the first two years. TPA anticipates exercising this right to relocate once final development plans have been finalized for this area.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group LLC at 410-290-7775.

Respectfully Submitted,
ARM Group LLC



Taylor R. Smith, P.E.
Project Manager



T. Neil Peters, P.E.
Senior Vice President

